

**IN THE UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA**

No. 12-7054

Hope 7 Monroe Street)	
Limited Partnership,)	
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Hope 7 Monroe Street Limited Partnership)	
)	
Appellant,)	
)	
v.)	
)	
Riaso, LLC)	
)	
Appellee.)	
_____)	

September Term 2011

**APPELLANT’S MOTION FOR LEAVE TO FILE
INITIAL SUBMISSIONS LATE**

COMES NOW Appellant, by and through undersigned counsel, and respectfully moves this Court for Leave to File Late Appellant’s Docketing Statement, Certificate as to Parties, Statement of the Issue(s), Appellant’s Deferred Appendix Statement, Transcript Status Report, Notice of Appearance, and Underlying Decision from which this appeal arises. On the morning of September 17, 2012 at 11:05 a.m., the undersigned attempted to contact Appellees’ counsel to obtain his consent via electronic mail prior to filing the immediate motion. However, counsel for Appellees’ did not respond to Appellant request as of 6:30 p.m. and thus no consent has been secured.

In support of this motion, Appellant states the following:

The delay in filing Appellant's documents listed above can, in large part, be attributed to the fact that undersigned counsel recently relocated his office of five (5) years to a new physical address, and, in doing so, experienced an array of major and unexpected logistical challenges. Aside from dealing with the usual trials of relocation, his July 6th move was delayed by an additional ten (10) days from actually transitioning into the new office space, for reasons beyond his control, the new office was not ready as plan. This delay caused undersigned counsel to have to move the physical office contents to storage and then to move a second time within one month, this time to the new office location. The unexpected delay temporarily displaced him and his support staff and disrupted his practice.

Additionally, after undersigned counsel was finally able to move into his new office space on July 16th, he was unable to secure phone and internet services for several weeks due to the technical complications attributed to Verizon. Hence, undersigned counsel's practice was significant disrupted through the end of July. Subsequent to the relocation and transition, undersigned counsel has made diligent efforts to meet all deadlines, including this one.

All required documents are now filed with this court. In light of the major and unexpected logistical challenges presented in the process of the undersigned counsel's relocation, this Honorable Court should grant Appellant's motion for

good cause shown. In this connection, Appellant has now filed with this court all outstanding documents and is prepared to proceed with a briefing scheduled that would allow this case to be considered on its merits.

WHEREFORE, Appellant respectfully moves this Honorable Court to grant this motion and allow Appellant to file the initial documents late.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on the 19th day of September 2012 a copy of the foregoing was served by use of the Court's Electronic Filing System, upon the following:

Richard Frank Boddie
Slocum & Boddie, P.C.
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Alexandria, VA 22312

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